

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JANETTE HERNANDEZ PAGAN, PPA,
FTH, a minor

CA. 3:17-CV-30031-MGM

Plaintiffs

v.

CITY OF HOLYOKE, A MUNICIPAL
CORPORATION, Officer THOMAS J. LEAHY,
Officer JAMES DUNN and Officer JABET LOPEZ,

Defendants

**PLAINTIFF'S ASSENTED TO MOTION FOR LEAVE TO FILE CERTAIN
PLEADINGS/EXHIBITS AND ATTACHMENTS UNDER SEAL (GENERAL RELEASE)
[LR 7.2]**

Now comes the Plaintiffs' and submit it is necessary to file the General Release associated with the Plaintiffs' Motion for Sanctions and to enforce payment of settlement agreement under seal in the interest of justice. In support thereof, Plaintiffs' Counsel states:

- 1) The General Release signed by Plaintiffs' (which Plaintiffs' enclose to enforce) has a confidentiality provision that expressly prohibits them from communicating to the public the facts of the settlement and the terms of the settlement of the subject legal action. See **Ex. 3.**
- 2) If Plaintiffs' were to attach the General Lease as an exhibit in PACER it would potentially result in a breach of said settlement agreement.
- 3) Thus, plaintiff respectfully submits this motion for leave to submit the said discovery related pleadings under seal.

Plaintiff s' respectfully requests that the impoundment order he seeks continue in effect until further order of the Court, and he anticipates that upon the termination of this action or previously, whether by agreement or by ruling of Court.

WHEREFORE, plaintiff respectfully requests that the motion be allowed and that the Court grant him leave to file the said attachment under seal.

Plaintiff, by his attorneys

/s/ Hector E. Pineiro

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-and-

/s/ Jeanne A Liddy

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DATED: December 20, 2019

CERTIFICATE OF LOCAL RULE 7.1 CONFERENCE

I, Hector E. Pineiro, certify that I have conferred with counsel for the parties, and counsel have agreed to assent to the within motion.

/s/ Hector E. Pineiro

Hector E. Pineiro

CERTIFICATE OF SERVICE

I, Hector Pineiro, certify that the within motion, filed this 20th day of December 2019, via the Court's electronic filing system, has thereby been served on all registered participants, and there are no unregistered participants.

/s *Hector Pineiro*

Hector Pineiro